

No. 20-437

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IN THE  
**Supreme Court of the United States**

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UNITED STATES,

*Petitioner,*

*v.*

REFUGIO PALOMAR-SANTIAGO,

*Respondent.*

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ON WRIT OF CERTIORARI TO THE UNITED STATES  
COURT OF APPEALS FOR THE NINTH CIRCUIT

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1, I, David A. O’Neil, a member of the Bar of this Court, certify on this 31st day of March 2021, that this Brief of Amicus Curiae, the National Association of Criminal Defense Lawyers, in the above-captioned case contains approximately 5,241 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

The brief was prepared in 12-point Century Schoolbook font.

Respectfully Submitted



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DAVID A. O’NEIL

*Counsel of Record*

Debevoise & Plimpton LLP